

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In Re:

Chapter 11

KUM GANG INC.,
Debtor.

Case No.: 18-43997-cec

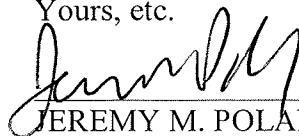
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NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY

PLEASE TAKE NOTICE that, upon the annexed Declaration of Jeremy M. Poland, the annexed Declaration of Mary Rahl, and the exhibits annexed thereto, the undersigned will make a motion before the Hon. Carla E. Craig, United States Bankruptcy Court, Courtroom 3529, at the United States Bankruptcy Court for the Eastern District of New York, at the Courthouse, Conrad B. Duberstein Courthouse, 271-C Cadman Plaza East, Brooklyn, New York 11201, on September 12, 2018, at 4:00 o'clock in the afternoon of that day or as soon thereafter as counsel may be heard, for an Order, pursuant to 11 U.S.C. §362, Bankruptcy Rule 4001 and Local Bankruptcy Rule 4001-1, vacating and modifying the automatic stay to permit movant to proceed with the state landlord tenant proceeding as the Debtor has failed to pay post-petition use and occupancy, the Debtor has no equity in the premises and the premises are not necessary to an effective reorganization of the debtor and the movant is not adequately protected.

Dated: Williston Park, New York
August 27, 2018

Yours, etc.



JEREMY M. POLAND, ESQ. (JP4587)
(email: jpoland@hwrpc.com)
HORING WELIKSON & ROSEN P.C.
11 Hillside Avenue
Williston Park, New York 11596
(516) 535-1700

TO: Kum Gang, Inc
138-28 Northern Blvd.
Flushing, NY 11354

Kenneth F. McCallion
McCallion & Associates LLP
100 Park Ave.
16th Floor
New York, NY 10017

United States Trustee
U.S. Federal Office Building
201 Varick Street, Suite 1006
New York, NY 10014